R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington. DC 20036

202 429 3125
202 293 0561 fax
Email hhaney@qwest.com

Qwest.

Spirit of Service

November 14, 2002

RECEIVED

NOV 14 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

EX PARTE OR LATE FILED

> Re: **WC Docket No. 02-314 – Application of Qwest Communications International Inc. for Authorization to Provide In-Region InterLATA Service in the States of Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") hereby responds to the question from the Commission's staff concerning Qwest's retail comparison to the due date change matrix.

The PID does not specify a retail comparison for PO-15, Number of Due Date Changes per Order, because the standard is specified as "diagnostic." Nevertheless, as additional information, Qwest is reporting a retail result, for purposes of looking at trends. These retail results consist of inward order types (as specified in the PID) for all products, just as on the wholesale side. In that vein, Qwest has emphasized that, because the measurement is not designed to support parity conclusions, the most that can be derived from a comparison of the CLEC and Retail results under PO-15 are general observations about trends, *i.e.*, increasing or decreasing. (For example, retail orders have a higher proportion of non-designed products, which typically have a lower incidence of due date changes than designed products, in comparison to wholesale orders.)

The twenty-page limit does not apply to this filing

Respectfully submitted.

Hance Haney

cc: E. Yockus
     M. Carowitz

No. of Copies rec'd 3
List ABCDE

G. Remondino
J. Myles
R. Harsch
J. Jewel
P. Baker
C. Post
P. Fahn
B. Smith
J. Stanley
C. Washburn
S. Vick
S. Oxley
J. Orchard